

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

S&S HOLDCO, INC.	:	Case No. 1:17-cv-00783
Plaintiff,	:	
	:	Judge William O. Bertelsman
v.	:	
	:	Magistrate Judge Karen L. Litkovitz
THREE RIVERS PROVIDER NETWORK, INC.,	:	
Defendant.	:	PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME

Now comes Plaintiff S&S Holdco, Inc., by and through counsel, and pursuant to S.D. Ohio Local Rule 7.3 respectfully requests a 24-hour extension as to the deadlines set forth in this Court's January 8, 2021 (Doc#75) and January 13, 2021 (Doc#76) respective Orders regarding (i) Plaintiff's Motion to Compel; and (ii) Defendant's Motion Opposing the Extension of the Expert Deadline. Due to recent inclement weather and a resulting power outage, Plaintiff's counsel has been delayed in finalizing its motion to compel and needs an additional 24-hours in order to prepare the same for filing. Plaintiff's counsel has conferred with Defendant's counsel who has no opposition to this motion.

A proposed order is attached in accordance with S.D. Ohio Civ. R. 7.4.

Respectfully submitted,

/s/ Peter A. Saba

Peter A. Saba (0055535)
Joshua M. Smith (0092360)
Jeffrey M. Nye (0082247)
STAGNARO, SABA
& PATTERSON CO., L.P.A.
2623 Erie Avenue
Cincinnati, Ohio 45208
(513) 533-2701
(513) 533-2711 (fax)

pas@sspfirm.com

Attorneys for S&S Healthcare

As Seen and Agreed,

/s/ Simon Y. Svirnovskiy, (via authorization)

Maureen A. Bickley (0085075)

Stephen R. Hemick (0088381)

Simon Y. Svirnovskiy (0097096)

Frost Brown Todd LLC

3300 Great American Tower

301 East Fourth Street

Cincinnati, Ohio 45202

(513) 651-6800

mbickley@fbtlaw.com

shernick@fbtlaw.com

Counsel for Three Rivers Provider Network

CERTIFICATE OF SERVICE

I certify that the foregoing was served on all counsel of record on the date of filing through the court's CM/ECF system.

/s/ Peter A. Saba

Peter A. Saba (0055535)